

**IN THE UNITED STATES DISTRICT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

CRAIGVILLE TELEPHONE CO. d/b/a)	
ADAMSWELLS; and CONSOLIDATED)	
TELEPHONE COMPANY d/b/a CTC)	
)	
Plaintiffs,)	No. 1:19-cv-07190
)	
vs.)	Judge John Z. Lee
)	Magistrate Judge Jeffrey T. Gilbert
T-MOBILE USA, INC.; and)	
INTELIQUENT, INC.)	
)	
Defendants.)	

**T-MOBILE’S MOTION FOR ENTRY OF PROTECTIVE ORDER
REGARDING PLAINTIFFS’ AMENDED NOTICE OF
30(B)(6) RECORDS CUSTODIAN DEPOSITION**

Defendant T-Mobile USA, Inc. (“TMUS”) respectfully submits this motion (the “Motion”) for Entry of Protective Order regarding the Amended Notice of 30(b)(6) Records Custodian Deposition (the “Notice”) served on TMUS on November 16, 2021 by Plaintiffs Craigville Telephone Co. d/b/a AdamsWells and Consolidated Telephone Company d/b/a CTC (together, “Plaintiffs”).

In the Court’s September 15, 2021 Order (ECF No. 158), Magistrate Judge Gilbert expressed a preference for joint motions to resolve discovery disputes, if at all possible, but noted that if a party wanted to use a different procedure, it should so inform the Court. Given the timing considerations of the present Motion (as explained in TMUS’s accompanying memorandum of law), it was not feasible to comply with the joint motion procedure.

This Motion complies with Local Rule 37.2. The parties met and conferred via video conference on November 5, 2021 at 4pm Eastern and on November 15, 2021 at 5:30pm Eastern,

but were unable to resolve their disputes. David Carter, Cathy Hinger and Jeremy Baker participated on behalf of Plaintiffs and Om Alladi and Tiffany Woo participated on behalf of TMUS.

WHEREFORE, for the reasons explained in TMUS's accompanying memorandum of law, TMUS respectfully requests that this Court enter an order (1) holding that a single deposition of TMUS's Rule 30(b)(6) records custodian designee should take place after the parties' disputes over the topics in the Notice have been resolved and on a date when TMUS's records custodian designee is available, and (2) sustaining TMUS's objections to the improper topics in the Notice and directing that TMUS need not produce a witness to testify about those topics.

Dated: November 16, 2021

Respectfully submitted,

/s/ Nigel F. Telman

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CERTIFICATE OF SERVICE

The undersigned attorney, on oath, certifies that on November 16, 2021, he served the foregoing **Motion for Entry of Protective Order Regarding Plaintiffs' Amended Notice of 30(b)(6) Records Custodian Deposition** via the ECF system to all parties that have consented to same in accordance with applicable Federal Rules of Civil Procedure and Local Rules of the U.S. District Court for the Northern District of Illinois.

By: /s/ Nigel F. Telman
Nigel F. Telman